

ALB:BTR
F.#2019R00

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

- against -

JUAN TAVERAS,

Defendant.

C O M P L A I N T

M. No. 19mj 377
(T. 21, U.S.C., §§ 841(a)(1))

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EASTERN DISTRICT OF NEW YORK, SS:

Michael M. Bornstein, a Task Force Officer with the Drug Enforcement Administration (“DEA”), being duly sworn, depose and states:

Upon information and belief, on or about April 18, 2019 within the Eastern District of New York, the defendant JUAN TAVERAS, together with others, did knowingly and intentionally possess, and possess with intent to distribute a controlled substance, which offense involved both 1 kilogram or more of heroin, a Schedule I controlled substance and cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Section 841(a)(1)).

The source of my information and grounds for my beliefs are as follows:

1. I have been a Task Force Officer with the DEA for approximately (12) years and am currently assigned to the Long Island District Office, New York where I am tasked with investigating narcotics trafficking as well as other offenses. During my tenure with the DEA, I have participated in numerous narcotics investigations, I have

conducted physical surveillance, monitored undercover operations, debriefed cooperating witnesses and confidential informants, monitored wiretaps, and interviewed civilian witnesses.

2. Because this affidavit is being submitted for the purpose of establishing probable cause to arrest, I have not included every detail of every aspect of the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause. Unless specifically indicated, all conversations and statements described in this affidavit are related in substance and in part only.

3. The DEA has been investigating heroin traffickers distributing heroin in the Eastern District of New York, including Nassau and Suffolk Counties. As part of that investigation the DEA became aware of JUAN TAVERAS, a drug dealer in cocaine and heroin active in distributing drugs in the Eastern District of New York.

4 On April 18, 2019, the DEA had the defendant JUAN TAVERAS. under surveillance. The defendant has recruited two individuals to transport him to Hempstead, New York. The defendant was driven to a parking lot adjacent to the Home Depot shopping center in the Village of Hempstead, arriving at approximately 7:50 p.m. Once in the parking lot, the defendant left his companions in the car and was patrolling the parking lot on foot, and appeared to be speaking on his cell phone numerous times. The defendant appeared to be waiting for someone. As surveillance continued, at approximately 8:35 the defendant returned to the vehicle and the vehicle exited the parking lot. The vehicle then suddenly stopped in the roadway blocking vehicular traffic, a marked Hempstead Village police vehicle then using lights pulled the vehicle over. A driver and passenger were in the front seats,

JUAN TAVERAS was sitting alone in the rear seat of the Honda Odyssey mini-van. The officer observed TAVERAS make furtive motions with his hands. The Officer, for his personal safety, requested TAVERAS exit the vehicle, while other officers could keep an eye on him. Once the rear door of the van was opened and TAVERAS exited, a rock of white power, appearing to be cocaine was in open and plain sight overflowing the side pocket of the rear seat by the van door, near where TAVERAS was sitting. A Task Force Officer took possession of the rock. It field tested positive as a controlled substance. Once the side pocket was pulled open, it became apparent that under the cocaine was another brown brick substance, covered in clear tape. This substance appeared to be a kilogram of heroin. The defendant was then arrested.

5. The driver, the owner of the vehicle, and passenger were initially questioned by the agents and separately indicated that they were paid to drive the defendant to Long Island from upper Manhattan and had no knowledge of the existence of the drugs,

WHEREFORE, I respectfully request that the defendants JUAN TAVERAS, be dealt with according to law.



Michael M. Bornstein,
Task Force Officer
DEA

Sworn to before me this
19th day of April, 2019

/s/ Anne Y. Shields

HONORABLE ANNE Y. SHIELDS
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK